

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

ANGELA ENGLE HORNE,

Plaintiff,

v.

Civil Action No. 3:16cv92

WTVR, LLC, d/b/a CBS 6,

Defendant.

VOIR DIRE

NOW COMES Defendant, WTVR, LLC, d/b/a CBS 6, by counsel, and submits its proposed Voir Dire questions as follows:

1. Do you or any member of your family have any personal business or professional relations with Angela Horne or any member of her family?
2. Are you or any member of your family currently or formerly employed by WTVR?
3. Do you or any member of your family have any personal relationship with the following persons who may be called as witnesses?
 - (a) Wayne Covil
 - (b) Stephen Hayes
 - (c) Sheryl Barnhouse
 - (d) Scott Wise
 - (e) Michael Bergazzi
 - (f) Misty Davidson
 - (g) Bobby Browder
 - (h) Angela Engle f/k/a Horne
 - (i) Keith Horne

- (j) Randy Bullock
- (k) Kenneth Hill
- (l) Sabrina Taylor
- (m) William Oldaker
- (n) Susan Wilson
- (o) Susan Powroznik
- (p) Yolanda Holmes-Williams
- (q) Cody Engle
- (r) Lindsey Robbins
- (s) Dr. John G. Villanueva

4. Have you or any member of your family ever been employed by the Prince George County School System?
5. How do you primarily receive or get news?
6. Do you find news coverage in the print media to be reliable and accurate?
7. Do you find news coverage on television to be reliable and accurate?
8. Are there any particular news outlets that you find to be particularly trustworthy?
9. Are there any particular news outlets that you find to be particularly untrustworthy?
10. Do you have any feelings that the media publishes inaccurate information?
11. Do you have any feelings that the media is the enemy of the public?
12. Do you have any opinions concerning the accuracy of local news on televisions?
13. Do you have any feelings toward WTVR in general or about any of the broadcasts that have appeared on WTVR?
14. Have you ever complained about media coverage of anything?

15. Do you have any problem with a television station reporting accurately on a governmental action no matter whether you or anyone else agrees with the action?
16. Do you have any problem with the fact that the actions of the School Board are newsworthy?
17. Do you have any problem with the fact that a violation of law by a public body or a public official is newsworthy?
18. Can you follow the Court's instructions whether you agree with the law or disagree?
19. Do you have any reason to believe you could not be fair to a broadcaster?
20. Have you or any member of your family or anyone you know been the subject of any unfavorable publicity in the media?
21. Can you treat a television station for purposes of this lawsuit just as you would treat any other citizen or person?
22. Have you expressed any criticism toward the media or any journalist?
23. Do any of you have a problem with the fact that a journalist receives information from a confidential or anonymous source?
24. Do you have any problem with the idea that the public has a right to be informed of everything that is done by the School Board so that it can hold the School Board accountable in elections?
25. Have you ever been involved in a lawsuit?

Dated: April 5, 2017

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

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/s/

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